



MEMO ENDORSED

HON. SYLVIA O. HINDS-RADIX
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April 25, 2022

VIA ECF

Hon. Katherine H. Parker
Daniel Patrick Moynihan
United States District Court
500 Pearl Street
New York, New York 10007

APPLICATION DENIED

Katharine H. Parker
KATHARINE H. PARKER
United States Magistrate Judge

Re: *J.M.-U., et al. v. N.Y.C. Dep't of Educ.* 20-cv-10600 (LTS)(KHP)

04/26/2022

Dear Judge Parker:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, the Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, et seq., as well as for this action.

I write to respectfully request a 14-day adjournment of the Case Management Conference from April 27, 2022 to May 11, 2022. This is the first request for an adjournment and Plaintiff consents. The parties continue to engage in settlement discussions and have exchanged offers and counteroffers, most recently on April 18, 2022. In light of the progress that has been made over the last couple of weeks, the parties expect this case to resolve without the need for conferences or motion practice.

Accordingly, the parties respectfully request an adjournment of the Case Management Conference to May 11, 2022.

Thank you for considering this request.

Respectfully submitted,

W. Simone Nicholson

W. Simone Nicholson
Special Assistant Corporation Counsel

cc: Irina Roller, Esq. (via ECF)